



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA



May 6, 2019

Dr. Terrance J. Fulp, Regional Director
Lower Colorado Regional Office
Boulder Canyon Operations Office
U.S. Bureau of Reclamation
P.O. Box 61470
Boulder City, NV 89006-1470
Via email

Dear Dr. Fulp:

The Metropolitan Water District of Southern California (Metropolitan) and Imperial Irrigation District (IID) Joint Request to Credit Extraordinary Conservation Intentionally Created Surplus (EC ICS) Created by IID in 2017 to Metropolitan's ICS Account

As you are aware, Metropolitan and IID have been cooperating to store conserved water in Lake Mead to offset drought conditions. In 2017, both agencies conserved significant amounts of water with the intent of maximizing the amount of EC ICS that California could store in Lake Mead pursuant to the 2007 Interim Guidelines¹. In furtherance of this effort, Metropolitan and IID propose to credit water conserved by IID in 2017 through participation in IID's EC ICS programs to Metropolitan's EC ICS account in Lake Mead through application of Section XI.G.3(B)(8) of the 2007 Guidelines.

The 2007 Guidelines established the Intentionally Created Surplus (ICS) Program specifically to encourage efficient use of water and to help increase the volume of water stored in Colorado River system reservoirs. Under the 2007 Guidelines, California may create up to 400,000 acre-feet of EC ICS annually. California's ICS Agreement² provides that of this amount, IID may store up to 25,000 acre-feet of EC ICS in Lake Mead annually (50,000 acre-feet cumulatively) and Metropolitan may create and store the remaining California allotments. An amendment to the California ICS Agreement in 2015 also allowed IID to store up to 100,000 acre-feet of Excess EC ICS annually during 2015-2017 (200,000 acre-feet cumulatively) within Metropolitan's system, provided that Metropolitan could modify its operations to accept such water.

¹ Record of Decision Colorado River Interim Guidelines for Lower Basin Shortages and the Coordinated Operations for Lake Powell and Lake Mead dated December 2007.

² California Agreement for the Creation and Delivery of Extraordinary Conservation Intentionally Created Surplus dated December 13, 2007.

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In 2017, IID's conservation efforts totaled 80,937 acre-feet of conservation in excess of its contractual transfer agreements. Of this amount, IID stored 21,983 acre-feet in its Lake Mead EC ICS, thereby maximizing its 50,000 acre-foot cumulative limit. Through letters exchanged between IID and Metropolitan, Metropolitan agreed to store up to 69,000 acre-feet of IID's remaining excess conservation in Metropolitan's system, provided that storage of such water did not result in Metropolitan exceeding its own EC ICS limitations in 2017. Metropolitan determined it was not able to modify its year-end operations to accept all of IID's excess conserved water without potentially putting its own water supply at risk. Metropolitan was able to accept 23,676 acre-feet of IID's excess conservation, leaving 35,278 acre-feet of conserved water in Lake Mead.

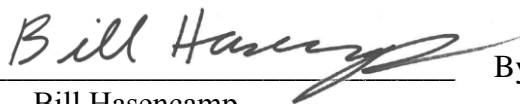
Metropolitan and IID propose to credit the 35,278 acre-feet of IID excess conserved water to Metropolitan's EC ICS account through application of Section XI.G.3(B)(8) of the 2007 Guidelines. Section XI.G.3.(B)(8) permits ICS from a project within a state to be credited to the ICS account of another contractor within the same state with written agreement by the entity that funded the conservation. To implement Section XI.G.3(B)(8), IID would store an additional 35,278 acre-feet of qualifying ECICS it funded in Metropolitan's EC ICS account.

This letter serves to notify Reclamation that IID and Metropolitan have jointly agreed that 35,278 acre-feet of EC ICS created by IID be credited to Metropolitan's EC ICS account, and we request your approval that this volume of water be credited to Metropolitan's EC ICS through application of Section XI.G.3.(B)(8) of the 2007 Guidelines.

Should you have any questions regarding our request, please contact either of us.

Very truly yours,

By:



Bill Hasencamp
The Metropolitan Water District
Of Southern California

By:



Tina Anderholt Shields, PE
Imperial Irrigation District

LL:vsm